

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CAPTEC FINANCIAL GROUP, INC.,  
24 Frank Lloyd Wright Dr.  
Lobby 1, 4<sup>th</sup> Floor  
Ann Arbor, Michigan 48106,

Plaintiff,

vs.

BAGGA ENTERPRISES, INC.,  
121 Dickerson Road, Unit 6  
North Wales, Pennsylvania 19454,

JAMUNA REAL ESTATE, LLC  
121 Dickerson Road, Unit 6  
North Wales, Pennsylvania 19454

UNITED MANAGEMENT SERVICES, INC.,  
121 Dickerson Road, Unit 6  
North Wales, Pennsylvania 19454,

-and-

WELCOME GROUP, INC.  
121 Dickerson Road, Unit 6  
North Wales, Pennsylvania 19454,

Defendants.

Civil Action No. 02-CV-2709

**AFFIDAVIT FOR ENTRY OF DEFAULT**

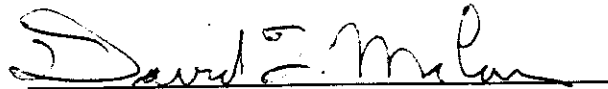
STATE OF PENNSYLVANIA:

:SS

COUNTY OF PHILADELPHIA:

David F. McCann, Esquire, being duly sworn, deposes and says, that he is the attorney for Plaintiff in the above-entitled action, that Summons and Complaint in this action were served on Defendants on May 14, 2002, that Defendants are not infants or incompetent, that

the parties entered into a Forbearance Agreement whereby Plaintiff agreed to wait until August 30, 2002, before continuing its pursuit of legal action, that such Forbearance Agreement has now expired and has not been extended, that the time within which the Defendants may answer or otherwise move as to the Complaint has expired and that Defendants have not answered or otherwise moved, that on September 13, 2002, Plaintiff moved for a default, that on September 24, 2002, the Court directed the Clerk of Court to enter default provided the requirements were met, that on September 25, 2002, the Clerk of court entered default (Attached as Exhibit A), that the amount due and owing is \$371,701.66 as of September 27, 2002, plus interest at the rate of \$328.16 per diem from that day forward, and that Defendant is entitled to injunctive relief concerning the collateral set forth in the Progress Payment Security Agreement (Attached as Exhibit C) and the Deed of Trust and Assignment of Leases and Rents (Attached as Exhibit D).



Kevin W. Walsh  
Pa. Attorney I.D. No. 32699  
David F. McCann  
Pa. Attorney I.D. No. 87609  
Pepper Hamilton LLP  
3000 Two Logan Square  
Eighteenth and Arch Streets  
Philadelphia, PA 19103  
215-981-4000

Attorneys for Plaintiff

Dated: September 27, 2002

SWORN TO AND SUBSCRIBED BEFORE ME  
THIS 27th DAY OF September 2002

